



AUG 1 2001

Reply to the Attention of:

Mr. Phil Work
Indian Mill & Lumber Inc.
11107 Jones Road West
Houston, Texas 77065

Dear Mr. Work,

This responds to your May 14, 2001, letter to the Occupational Safety and Health Administration (OSHA), requesting a letter stating that the *Pin-Lok* scaffold plank product manufactured by Indian Mill & Lumber, Inc. meets the specified engineering criteria for wood scaffold planks.

Our Office of Engineering Services conducted an independent structural analysis of the planks using the submitted information. They determined that the plank meets the OSHA requirements for factor of safety and deflection for the loads and spans specified in the brochure attached to your request titled "*Indian Mill & Lumber Inc. IM&L, Revolutionizing the Scaffold Industry, Pinned Scaffold Planks.*" While the plank meets the OSHA requirements for these loads and spans, its safe use depends on the consumer following the manufacturer's recommendations.

If we can be of further assistance, please contact us again by writing to: Directorate of Construction - OSHA, Office of Construction Standards and Compliance Assistance, Room N3468, 200 Constitution Avenue, N. W., Washington, D.C. 20210.

Sincerely,

Russell B. Swanson, Director
Directorate of Construction

NOTE: OSHA requirements are set by statute, standards and regulations. Our interpretation letters explain these requirements and how they apply to particular circumstances, but they cannot create additional employer obligations. This letter constitutes OSHA's interpretation of the requirements discussed. Note that our enforcement guidance may be affected by changes to OSHA rules. Also, from time to time we update our guidance in response to new information. To keep apprised of such developments, you can consult OSHA's website at <http://www.osha.gov>.

DEPARTMENT OF INDUSTRIAL RELATIONS
DIVISION OF OCCUPATIONAL SAFETY AND HEALTH455 Golden Gate Avenue, 10th Floor
San Francisco, CA 94102-3677ADDRESS REPLY TO:
P.O. BOX 420603
San Francisco, CA 94142-0603

17 September 2001

Dean Cook
Indian Mill & Lumber, Inc.
11107 Jones Road West
Houston, TX 77065

Subject: Pin-Lok® Scaffold Plank – CSO 8-1637

Dear Mr. Cook;

The Division of Occupational Safety and Health has received your submittal of August 3, 2001, regarding the Pin-Lok® scaffold plank manufactured by Indian Mill & Lumber, Inc.

The submittal contained the following items:

1. A product brochure for the Pin-Lok® scaffold plank,
2. test report and video with affidavit of Ralph Bennett, III, PE,
3. US-DOL OSHA letter of 01 August 2001 to Indian Mill & Lumber,
4. letter to Indian Mill & Lumber from Paramount Scaffold Co. of 24 July 2001, and
5. Patent application forms concerning the Pin-Lok® scaffold plank executed by Douglas Holman.

Title 8, Construction Safety Orders, section 1637(f) (1) states: Except as specified in other Orders, all planking shall be at least equivalent to 2-inch x 10-inch (nominal) lumber selected for scaffold grade plank as defined in Section 1504, Lumber--"Structural Plank." [Emphasis Added]

Based on our review of your submittal the Division concludes that the Pin-Lok® manufactured scaffold plank, as represented, satisfies the equivalency requirement of CSO section 1637(f)(1).

Users of these products may not be sufficiently familiar with the characteristics of the product to perform a competent inspection in the field because manufactured plank products differ from sawn lumber in various respects. It is strongly suggested that Indian Mill & Lumber, Inc. provide specific inspection and removal criteria to users of its Pin-Lok® scaffold plank.

The referenced Cal/OSHA regulations are available via the World Wide Web at <http://www.dir.ca.gov>. If you have additional questions related to this subject please contact Patrick Bell or me at 415-703-5100.

Sincerely,

Larry McCune, PE
Principal Safety Engineer
DOSH – Research and Standards Unit

LM/pb

cc: District Managers, Senior Safety Engineers

File: CSO 8-1637